

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

JEROME MADISON,
Plaintiff,

vs.

**CHAROLETTE COURTNEY and
AMERICAN AIRLINES, INC.,
Defendants.**

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CIVIL ACTION NO. 4:18-cv-671-O

JURY DEMANDED

**PLAINTIFF'S WITNESS LIST
(Scheduling Order §II, ¶8(b))**

Pursuant to the instructions contained in Section II, Paragraph 8(b) of the Court's Scheduling Order [D.E. 40], Plaintiff, Jerome Madison, submits this Witness List.

a. Probable Witnesses

Name/Summary	Sworn	Testified
<p>Jerome Madison 12102 Jackson Creek Drive Dallas, Texas 75243</p> <p><i>Plaintiff. Mr. Madison will testify about the discriminatory treatment that he received aboard American Airlines Flight 1087 on January 21, 2016, and after the flight landed while he was attempting to lodge a complaint in the Atlanta airport. He will testify about the drink that he was served by Flight Attendant Courtney and the mucus that he found in it. He will also testify about the effects that the discriminatory treatment had on his emotional and physical wellbeing and have continued to have.</i></p> <p>Deposed. Expected duration of direct examination: 3 hours</p>		

<p>Kimberley Ballard-Madison 12102 Jackson Creek Drive Dallas, Texas 75243</p> <p><i>Jerome Madison's wife. She will testify about the effects that the discriminatory treatment had on her husband.</i></p> <p>Not deposed. Expected duration of direct examination: 1 hour</p>		
<p>Charolette Courtney c/o Anderson & Riddle, L.L.P. 1604 8th Avenue Fort Worth, Texas 76104</p> <p><i>Co-Defendant. Expected to testify about her interaction with Plaintiff on January 21, 2016, the making of his cocktail, service provided in the First Class cabin, service standards, her training, her written notes, her deposition testimony, her neighborhood and country club membership, her prior interactions with minority passengers</i></p> <p>Deposed. Expected duration of cross-examination: 3 hours</p>		
<p>Douglas Courtney c/o Diana L. Klein, Esquire Klein & Associates, LLC 2450 Riva Road Annapolis, MD 21401</p> <p><i>Co-Defendant Courtney's ex-husband. Expected to testify about his knowledge of Co-Defendant Courtney spanning fifteen years, and her frequent use of racial epithets during that time to describe African-Americans</i></p> <p>Not deposed. Expected duration of direct examination: 1 hour</p>		
<p>David Basher c/o Caris Life Sciences, Inc. 750 West John Carpenter Freeway, Suite 800 Irving, Texas 75039</p>		

<p><i>Co-worker of Plaintiff's at time of incidents. Expected to testify concerning his observations about the effect of the acts of discrimination on Plaintiff.</i></p> <p>Not deposed.</p> <p>Expected duration of direct examination: 30 minutes</p>		
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b. Possible Witnesses

Name/Summary	Sworn	Testified
<p>Rev. Dr. William J. Barber, II c/o Michael Allen, Esquire 1225 19th St. NW, Ste. 600 Washington, DC 20036</p> <p><i>Dr. Barber is an African-American individual who was subjected to racial discrimination aboard an American Airlines flight. He may be called to testify about what he experienced.</i></p> <p>Not deposed.</p> <p>Expected duration of direct testimony: 1 hour</p>		
<p>Bradley Leclear Fox Lake, IL</p> <p><i>Former passenger on American Airlines flight. May be called to testify about witnessing Courtney say "kill them all" referring to passengers aboard an American Airlines aircraft.</i></p> <p>Not deposed.</p> <p>Expected duration of direct testimony: 30 minutes</p>		

c. Experts

NONE	Sworn	Testified
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d. Record Custodians

NONE	Sworn	Testified
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Dated this 3rd day of January, 2019.

**ABRAHAM, WATKINS, NICHOLS,
SORRELS, AGOSTO & AZIZ**

/s/ Muhammad S. Aziz
MUHAMMAD S. AZIZ
Texas Bar No. 24043538
maziz@abrahamwatkins.com
800 Commerce Street
Houston, Texas 77002
(713) 222-7211
(713) 225-0827 (Fax)
Co-counsel for Plaintiff

PARK AVENUE LAW LLC

/s/ John D. McKay
JOHN D. MCKAY
Admitted *Pro Hac Vice*
johndmckayatty@gmail.com
127 W. Fairbanks Ave., No. 519
Winter Park, FL 32789
(800) 391-3654
(407) 264-6551 (Fax)
Co-counsel for Plaintiff